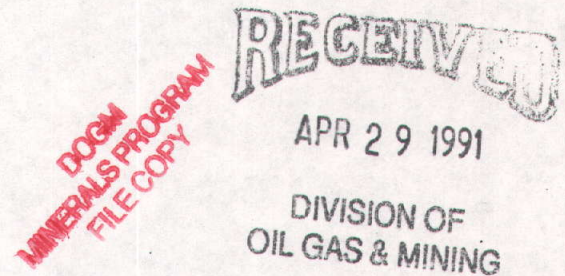


W. Hedberg
Tenneco Minerals
A Tenneco Company

12136 W. Bayaud Ave.
P.O. Box 281300
Lakewood, Colorado 80228
(303) 987-6200
April 12, 1991



Mr. Don Ostler
Executive Secretary
Bureau of Water Pollution Control
P.O. Box 16690
Salt Lake City, UT 84116-0690



RE: Response to Item No. 2,
Notice of Violations and
Order Docket No. 191-03

Dear Mr. Ostler:

This letter is in response to item number 2 of the Order contained in the above referenced Notice of Violations and Order, which is as follows:

Submit a report to the Executive Secretary within fifteen (15) days of receipt of this ORDER that defines in detail the actions taken and/or planned to be taken including a schedule, in order to comply with this ORDER.

The actions that Tenneco Minerals has taken and/or plans to take to comply with this ORDER by item number are listed below:

1. **"Immediately comply with the foregoing and any other applicable water pollution control laws and regulations."**

Tenneco Minerals is currently complying with applicable water pollution control laws and regulations. Tenneco Minerals has submitted a detailed report of actions taken or planned to be taken in its letters to the Bureau dated March 19, March 21, March 26 and April 3, and April 9, 1991, copies of which are attached hereto for your convenience.

Tenneco Minerals has taken or plans to take the following actions to minimize any potential impacts to the environment:

- a. Two emergency storage ponds were constructed on March 16-18, 1991 and March 22-24, 1991 on permitted heap leach pad 1 (one on top of cells 7 and 8 and the other on top of cells 5 and 6) to avoid emergency discharges to the sedimentation pond. The construction details were submitted to the Bureau on March 21, 1991 (Emergency Storage Pond 1) and March 26, 1991 (Emergency Storage Pond 2) and the Bureau's representative inspected the ponds on April 4, 1991.
- b. On April 5, 1991 Tenneco Minerals began modifying the stormwater diversion system by constructing stormwater channels to direct runoff around the pad and pond areas. Tenneco Minerals anticipates this work will be completed by April 24, 1991.

Mr. Don Ostler
April 12, 1991
Page 2

c. A Remedial Plan to repair the damaged primary flexible membrane liners of barren and process water ponds was submitted to the Bureau on March 19, 1991. A more detailed repair schedule was submitted to the Bureau on April 3, 1991 in response to item 6 of the Order and was discussed with representatives of the Bureau on April 4 and April 9, 1991.

d. The sedimentation pond will be converted to a containment structure to contain stormwater runoff. This project will be completed after analysis of remediation and construction requirements, but in any event no later than October 31, 1991.

2. **"Submit a report to the Executive Secretary within fifteen (15) days of receipt of this ORDER that defines in detail the actions taken and/or planned to be taken, including a schedule, in order to comply with this ORDER."**

This letter dated April 12, 1991 is submitted to the Bureau in response to this item of the Order.

3. **"Submit within thirty (30) days a detailed implementation plan and schedule, including necessary engineering, hydrologic and geotechnical evaluation, for restoration, remedy and upgrade of the process ponds and stormwater conveyance structures and appurtenances."**

Following the blast incident, Tenneco Minerals immediately initiated remedial action by repairing all accessible punctures in the flexible membrane liner (FML) of the process ponds. Per the Bureau's March 12, 1991 request which preceded the issuance of the March 26, 1991 Notice of Violations and Order, Tenneco Minerals submitted a remedial plan for the damaged process ponds on March 19, 1991. More specific repair details and repair dates were provided in a letter submitted to the Bureau on April 3, 1991 and discussed with representatives of the Bureau on April 4 and April 9, 1991.

The damaged primary FML on the process water pond was repaired on April 5, 1991. An additional 80 mil. high density polyethylene liner was installed on top of the repaired original FML. The barren pond FML will be repaired the week of April 15, 1991 as described in Tenneco Minerals' letter dated April 9, 1991 to the Bureau.

As stated earlier, Tenneco Minerals is currently modifying the stormwater diversion system by constructing diversion channels to carry stormwater runoff around the pads and ponds. Tenneco Minerals anticipates this work will be completed by April 24, 1991.

Mr. Don Ostler
April 12, 1991
Page 3

Tenneco Minerals will submit by April 26, 1991 a detailed implementation plan and schedule that addresses the issues in item 3. This plan and schedule will also describe the status of activities in progress and that are completed.

4. **"Submit plans for the Executive Secretary approval to conduct a ground water study to define the vertical and horizontal extent of contamination needed to assess corrective actions for ground water cleanup."**

Tenneco Minerals is in the process of implementing a monitoring well installation program pursuant to previous discussions with the Bureau. Tenneco Minerals will evaluate the results of the existing monitoring wells and the monitoring well installation program that is now in progress and will determine if additional actions are necessary or appropriate. Based on the results of this evaluation, Tenneco Minerals will submit a plan to the Bureau by May 31, 1991.

5. **"Minimize any adverse impact to the environment. Forthwith, cyanide must not be added to the process fluids without approval from the Executive Secretary."**

As mentioned in this letter and the letters previously submitted to the Bureau, Tenneco Minerals has taken and will continue to take actions to minimize potential adverse impacts to the environment.

Tenneco Minerals has not added cyanide to the process fluids since March 1, 1991 as stated in two letters submitted to the Bureau on March 19, 1991. Tenneco Minerals will not submit a request to the Executive Secretary to add cyanide to the process fluids until Tenneco is confident that it is safe to do so.

6. **"Show cause within five (5) days as to why the process ponds should not be neutralized, to minimize potential contamination of the ground water."**

Tenneco Minerals responded to this item of the Order an April 3, 1991 letter submitted to the Bureau.

Tenneco Minerals

Mr. Don Ostler
April 12, 1991
Page 4

If you have any questions on the above, please call me at (303) 987-6256.

Sincerely,



Debra Brannum
Environmental Services Manager

cc: R. Johnson
K. Kluksdahl
M. Keller - Van Cott, Bagley
B. Buck - JBR Consultants
G. Toland